

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE:	)	
Lee C. Keebler	)	Bankruptcy No. 21 B 03589
	)	Chapter 7
Debtor (s)	)	Judge Timothy A. Barnes
	)	
_____ Michael K. Desmond, Trustee	)	Adversary No. 22 A 00001
Plaintiff	)	
v.	)	
Lee C. Keebler and Pamela Keebler	)	
Defendants	)	

To: Justin M. Herzog: jherzog@sgrlaw.com

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that on August 31, 2022, at 9:00 a.m., I will appear before the Honorable Timothy A. Barnes, or any judge sitting in his place, and present the attached **Motion for Summary Judgment**, a copy of which is hereby served upon you.

**This motion will be presented and heard electronically using Zoom for Government.** No personal appearance at the courthouse is necessary or permitted. To appear and be heard on the motion, you must do the following:

**To appear by video**, use this link: <https://www.zoomgov.com/join>. Then enter the meeting ID and passcode.

**To appear by telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828- 7666. Then enter the meeting ID and passcode.

**Meeting ID and passcode.** The meeting ID for this hearing is 161 329 5276 and the passcode is 433658. The meeting ID and passcode can also be found on Judge Barnes' webpage on the court's website, <https://www.ilnb.uscourts.gov/content/judge-timothy-barnes#zoom-information>.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

David P. Lloyd  
615B S. LaGrange Rd.  
LaGrange IL 60525  
708-937-1264  
Fax: 708-937-1265

**CERTIFICATE OF SERVICE**

I, David P. Lloyd, an attorney, certify that I caused a copy of the foregoing Notice and Motion to be served on the parties listed on the attached service list electronically where indicated, or by first class mail by depositing with the United States Postal Service, LaGrange, Illinois, postage prepaid, prior to 5:00 P.M., this 24th day of August, 2022.

/s/ David P. Lloyd

David P. Lloyd

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Plaintiff	)	
v.	)	
Lee C. Keebler and Pamela Keebler	)	
Defendants	)	

**MOTION FOR SUMMARY JUDGMENT**

NOW COME the Defendants, Lee C. Keebler and Pamela Keebler, by and through their attorney, David P. Lloyd, and move this honorable Court for entry of a summary judgment, and in support thereof state as follows:

1. Plaintiff commenced this adversary proceeding by filing a Complaint to Avoid Fraudulent Transfer and for Other Relief on January 4, 2022.
2. Defendants filed their answer on February 2, 2022.
3. Based on the deposition testimony of the Debtor, the declaration of Defendant Pamela Keebler, and the other exhibits attached as exhibits to this Motion, there is no issue of material fact in this proceeding.
4. Defendants are entitled to a judgment on Counts I, II, and III, determining that the Trustee may not avoid the transfer of the Debtor's home to tenancy by the entirety, on on Counts IV and IV, determining that the Trustee may not recover and sell the Debtor's home.

WHEREFORE the Defendants, Lee and Pamela Keebler, pray for entry of summary judgment in their favor and against Plaintiff Michael K. Desmond, Trustee, on all counts.

Respectfully submitted,  
Lee C. Keebler and Pamela Keebler

By: /s/ David P. Lloyd  
Their attorney

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